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June 12, 2020

VIA ECF

The Honorable Judge Jesse M. Furman
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: Intl FCStone Markets, LLC V. Agro Santino OOD, No. 1:20cv2658

Dear Judge Furman:

We represent the Plaintiff Intl FCStone Markets, LLC, in the above-referenced matter. We write in response to Your Honor's June 11, 2020, Order (Dkt. 9) and respectfully request in accordance with Your Honor's Individual Rules of Civil Practice Rule 1(E) an adjournment of the initial pretrial conference, which is currently scheduled for June 25, 2020, at 4pm. Plaintiff has not previously requested any adjournment or extension.

The Defendant in this action, Agro Santino OOD, is a Bulgarian company. Plaintiff is in the process of attempting to effect service of process on Agro Santino under the Convention of 15 November 1965 on the Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (the "**Hague Convention**"). We understand that Bulgaria requires that service be effected under a strict procedure and the highest level of formality under Article 5(a) of the Hague Convention whereby service can only be effected through the Bulgarian Ministry of Justice.

For this reason, in addition to COVID-19 and attendant limitations on relevant operations of the authorized bodies, service is taking longer than ordinarily expected. Accordingly, Plaintiff does not anticipate being able to serve and confer with Defendant by the scheduled initial pretrial conference and respectfully suggests that the initial pretrial conference be adjourned 60 days to on or about August 25, 2020.

Respectfully submitted,

/s/ Jeffrey D. Rotenberg

Jeffrey D. Rotenberg

The initial conference is **RESCHEDULED** to **August 27, 2020, at 3:15 p.m.** The Clerk of Court is directed to terminate ECF No. 10. **SO ORDERED.**

A handwritten signature in black ink, appearing to read 'Jeff D. Rotenberg', written over a blue horizontal line.

June 12, 2020